

What to Expect from an Air Quality Inspection

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Quality

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Webinar Set Up

- All lines will be muted
- Questions can be sent to us via the question/chat box
- We will record webinar and post online



Lansing District Staff



Missing from photo: Nathan Hude and Julie Brunner

AIR QUALITY INSPECTIONS



What gives inspection authority?

NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION ACT

Act 451 of 1994

Section 324.5526



The department may, upon the presentation of credentials and other documents as may be required by law, and upon stating the authority and purpose of the investigation, enter and inspect any property at reasonable times for the purpose of investigating either an actual or suspected source of air pollution or ascertaining compliance or noncompliance with this part, rules promulgated under this part, the clean air act, a permit issued under this part, or any determination or order issued under this part. If in connection with an investigation or inspection, samples of air contaminants are taken for analysis, a duplicate of the analytical report shall be furnished promptly to the person who is suspected of causing the air pollution.

Who Gets Inspected?

- Any Facility – permitted or unpermitted
- Majority of inspections are unannounced.



Different Types of Inspections

- Scheduled Inspections
- Inspector Initiated Inspections (Self-initiated)
- Complaint initiated

ELEMENTS OF AN AIR INSPECTION



Preparation

How does the AQD inspector get ready?

- **Permits**
- **Past inspection reports**
- **Applicable Federal Regulations**
- **Past stack tests**
- **Correspondence**
- **Compliance history**
- **MAERS Reports**

Preparation

What if you are a new facility or you have never had an Air Quality inspection?

- **Your website**
- **Aerial photos**
- **Other regulatory sites**

What does the internet say about you?

The AQD inspector approaches...

What is your inspector looking at?

- Stacks
- Dust collectors
- Changes in the facility



What is your inspector smelling?

- Is an odor present
- Is it a normal smell for your process or industry
- If detected could it be associated with an upset or malfunction.

The AQD inspector is at the door – Now what??



Pre-Inspection Meeting

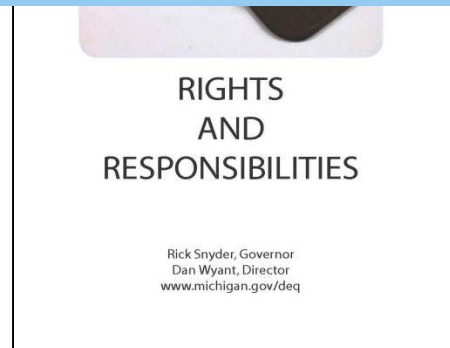
Your inspector will:

- Introduce themselves and provide photo identification
- Identify purpose of inspection
- Ask about new equipment or process changes

What does the inspector provide?



Environmental Inspection Brochure



Boiler NESHAP Card



Facility Inspection

During the inspection, your inspector will:

- **Ask questions about the processes and process equipment, including control and monitoring equipment**
- **Use Permit(s) as a reference**
- **Check condition of process equipment**
- **Take notes**

Facility Inspection

Walk Through the Facility

Facility Inspection

**Observe Control
Equipment**

Facility Inspection

Check Recording Devices

Facility Inspection

Take Notes

Post Inspection Meeting

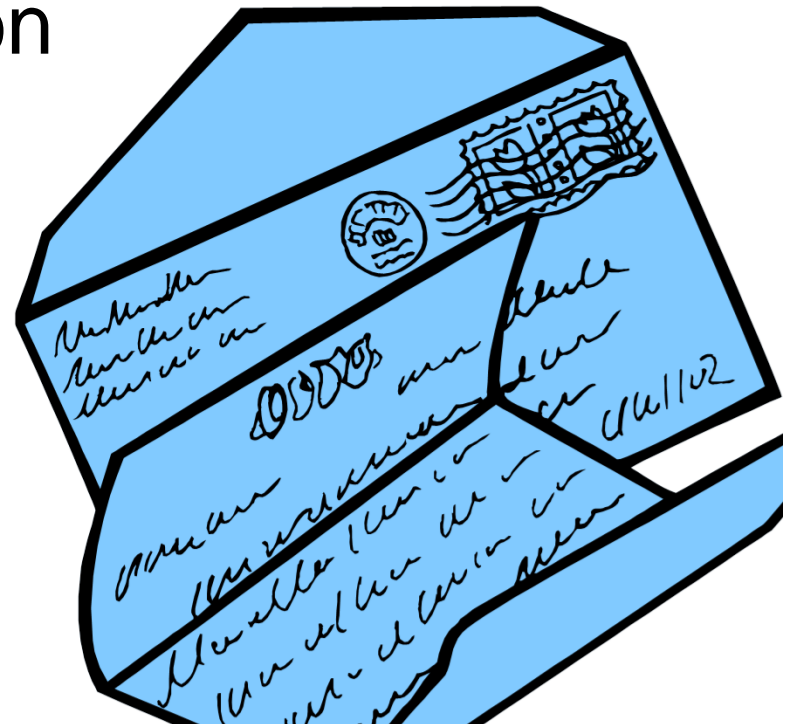
- Records review
- Review notes
- Preliminary findings of compliance status
- Other issues



What happens next?

Your inspector may:

- Request additional information
- Write up an inspection report
- If violations were observed a Violation Notice (VN) is sent



Your Inspection Report

Your AQD inspector will:

- E-mail a copy of the FINAL inspection report to you
- Ask for your input via an online survey
(You may remain anonymous!)



HOW TO PREPARE FOR AN AIR INSPECTION

Know your Facility!

Things you should be able to tell your inspector:

- Facility operations and equipment
- Stacks and other piping
- Control equipment
- Permitted or exempt

Do you have an AQD Permit?

The permit will identify requirements:

- Emission and material Limits
- Operational Restrictions
- Recordkeeping, monitoring, reporting

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

August 1, 2008

PERMIT TO INSTALL
No. 999-08

ISSUED TO
Sample Corporation

LOCATED AT
123 S. Main St
Anytown, Michigan 48888

IN THE COUNTY OF
Ingham

STATE REGISTRATION NUMBER
Z9999

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: 7/1/2008	
DATE PERMIT TO INSTALL APPROVED: 8/1/2008	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:



Comply with Permit Conditions

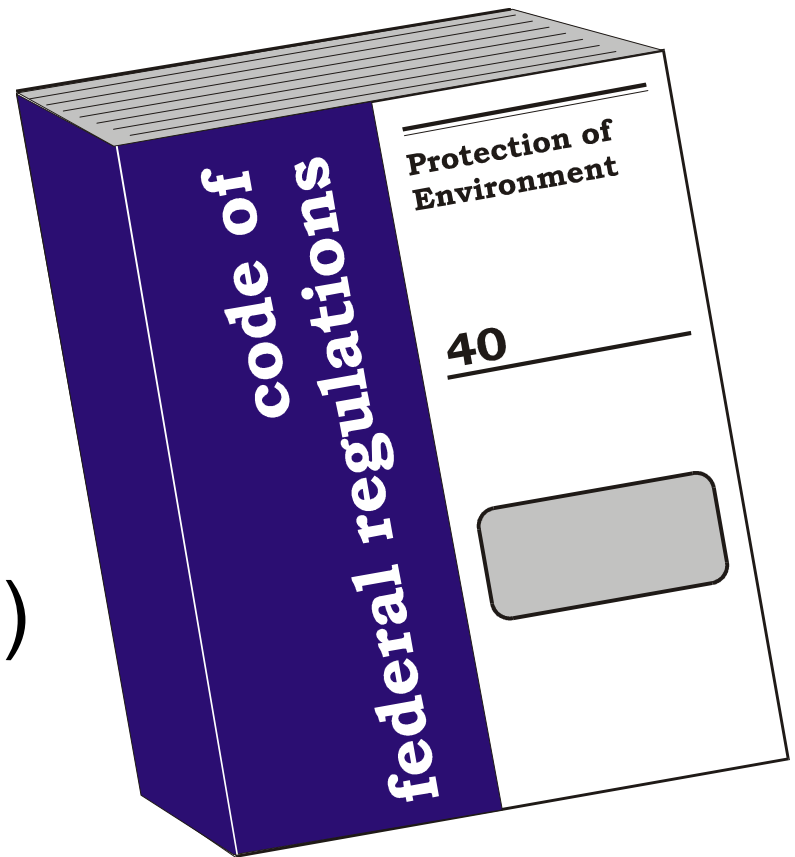
- Have records available, paper or electronic (most recent 2 years on-site, remaining 3 years off-site)
- Have more than one person know where records are kept and how to access them
- Keep compliance records in a centralized location or database
- Make sure records meet permit or standard requirements
- If a consultant is maintaining records, these should be supplied to you on a regular basis



Federal Regulations

Are you subject???

- MACT Standards (NESHAP)
- New Source Performance Standards (NSPS)



Online Databases

Periodically review
your status on
Enforcement &
Compliance History
Online (ECHO)

www.epa-echo.gov

- TRI Data
- Compliance Status
- Violation Notices Issued
- Recent Inspections

U.S. ENVIRONMENTAL PROTECTION AGENCY

Enforcement & Compliance History Online (ECHO)

Recent Additions | Contact Us
You are here: [ECHO Home](#) > [Compliance and Enforcement](#) > [ECHO](#) > Search All Data

ECHO Search Compliance Data (All Programs) [Help](#)

The All Data Search does not yet include drinking water data.

Facility Characteristics [Search](#)

Facility Name: [2d](#)

Permit ID(s): (Limit: 150)

"Cut & paste" from spreadsheet column or separate each ID by either a carriage return or a comma.

No 2-digit SIC Code Selected [2d](#) or

SIC Code: [2d](#) (Use to enter 3- or 4-digit codes)

[SIC Lookup](#) [EXIT Disclaimer](#)

NAICS Code: [2d](#) (Use to enter 2-, 3-, 4-, 5-, or 6-digit codes)

[NAICS Lookup](#) [EXIT Disclaimer](#)

Check out the AQD Website

www.michigan.gov/air

You can search for source information by SRN, City, Source Name and Zip Code.

The following information is available:

- Inspection Reports
- PTI's
- ROP's
- Annual Emissions Information
- Stack Test Executive Summaries
- Violation Notices
- Source Response to Violation Notices
- Enforcement Documents

The screenshot shows the DEQ website's 'Air Quality Source Information' page. The header includes navigation links for DEQ, Contacts, Permits, Online Services, Programs, and Locations, along with a Michigan.gov logo. A search bar is present. The left sidebar lists various topics: Air, Air Monitoring, Air Toxics, SIP and Attainment, Clean Air Assistance, Compliance, Emissions, Enforcement, Laws and Rules, Permits, Climate Change, Key Topics, Land, News and Events, Pollution Prevention, Waste, Water, Prosperity Regions, and logos for Healthy Michigan, SCORECARD, and OPEN Michigan. The main content area is titled 'Air Quality Source Information' and includes a 'SOURCE INFORMATION' section. It states that effective October 1, 2013, the Air Quality Division will begin posting inspection reports, stack test reports, executive summaries, enforcement documents, and annual emissions reports. It lists available files and naming conventions, source files (by SRN, City, Source Name, or ZIP Code), public comment documents (Consent Order, Permits to Install (PTI), and Renewable Operating Permits (ROP)), and permit documents (sorted by SRN, PTI, ROP, Source Name, PTI, ROP, or Location). It also provides a link for further information regarding the Freedom of Information Act (FOIA) Website. A footer note states that if a link leads to a page with only 'parent directory' showing, it indicates no documents are available at that time. The footer includes links to Michigan.gov Home, DEQ, Online Services, Permits, Programs, Site Map, Contacts, Office of Regulatory Reinvention, Spending & Accountability, State Web Sites, Policies, Michigan News, and Michigan.gov Survey, along with a copyright notice for 2014 State of Michigan.

Communication Goals



Inspector's Inspection Goals

Of course...

- Complete a full compliance inspection
- Determine your compliance with applicable Air Quality rules and regulations as well as with any permit condition

Also...

- Ensure your understanding of the rules and regulations you are subject to.
- Make sure you understand your compliance status
- Help you answer any questions or concerns you may have
- Have an open communication
- Provide you with excellent customer service

Moving Forward

When should you contact your inspector?

- If you are thinking of installing a new process that will emit air contaminants
- If your business is growing and you are getting close to your emission limits
- If you have a question about permitting exemptions
- If you have had a malfunction or release.
- If you have any questions about your facility operations with respect to Air Quality rule and regulations
- Etc.....

In short, anytime you have questions or concerns related to air quality.

Questions?

What's Coming Up?

Potential to Emit – What is it and why are all Air Quality Rules based on it?

September 23, 2015 at 10:00AM

Introduction to Air Permit to Install

October 21, 2015 at 10:00AM

**Air Quality and the Nonmetallic Mineral
Crushing Industry**

November 18, 2015 at 10:00AM

Please join us!



Want to know more?

Search YouTube for

“Michigan AQD - *Year of Clean Air*”



Wrap Up



AQD 101
Webinar
Series

- Recording
- Materials
- Evaluation

Michigan Department of Environmental Quality

800-662-9278

www.michigan.gov/deq



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